



Northwest Pulp & Paper
ASSOCIATION

Sent via email: nickel.brian@epa.gov

May 28, 2019

U.S. EPA Region 10
Attn: Director, Office of Water and Watersheds
1200 Sixth Avenue, Suite 155 (OWW-191)
Seattle, Washington, 98101

RE: Proposed NPDES Permit No. ID0001163 for Clearwater Paper Corporation

Dear Mr. Nickel:

Thank you for the opportunity to comment on EPA's reissuance of Clearwater Paper Corporation's proposed NPDES permit No. ID0001163.

The Northwest Pulp and Paper Association (NWPPA) is a 63-year old regional trade association representing 12 companies and 16 pulp and paper mills and various forest products facilities in Idaho, Oregon and Washington including Clearwater Paper Corporation. NWPPA members hold National Pollution Discharge Elimination System (NPDES) permits. On behalf of its members, NWPPA routinely participates in permit proceedings and the development water quality rules. Specific to Clearwater's permit NWPPA has participated in Idaho Department of Environmental Quality water quality standard negotiated rulemakings for human health and EPA Region 10 efforts to develop a Columbia River Temperature Total Maximum Daily Load. Please accept these comments on Clearwater's proposed NPDES permit behalf of our Association.

NWPPA staff has reviewed the draft permit for consistency with other EPA Region 10 states with NWPPA member pulp and/or paper mills and has the following overarching comments:

1. NWPPA reiterates and supports the written comments of Clearwater Paper Corporation on proposed permit No. ID0001163, dated May 28, 2019.
2. Proposed permit No. ID0001163 is inconsistent with other pulp and paper NPDES permits on the mainstem Columbia River system.
 - NWPPA suggests that the inconsistencies highlighted by Clearwater Paper's written comments be reviewed and corrected in the final permit to create a level playing field between Idaho, Washington and Oregon pulp and paper facilities

along with equal and reasonable application of federally approved water regulations and analytical water test methods.

3. Proposed permit No. ID0001163 policies and permit conditions are in conflict NWPPA's NPDES permit policies.
 - Clearwater Paper's written comments identify the inconsistent and conflicting permit conditions and propose solutions.
 - NWPPA asks that the EPA consider revisions to proposed NPDES permit No. ID0001163 to address our comments.
4. NWPPA is opposed to proposed NPDES permit ID ID0001163 conditions regarding mandating the use of analytical water test methods that have not gained federal regulatory approval through the federal Administrative Procedures Act and are thus *unapproved analytical water test methods*.
 - NWPPA reiterates and supports Clearwater's opposition to permit conditions mandating the use of unapproved federal analytical water test methods.
 - NWPPA suggests that only federally approved analytical water test methods be included in the final NPDES permit.
5. NWPPA requests that EPA respond to our NWPPA and Clearwater Paper comments in the response-to-comment document.

NWPPA appreciates the opportunity to comment on Clearwater Paper Corporation's proposed NPDES permit. I can be contacted at 360-529-8638 to answer any questions.

Sincerely,



Kathryn VanNatta
Director of Regulatory and Government Affairs
Northwest Pulp and Paper Association

cc: Dan Opalski, EPA
Chris Hladick, EPA
Anna Wilderman, EPA
David Ross, EPA
Mary Ann Nelson Idaho DEQ
John Cardwell, Idaho DEQ